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Attorneys for Plaintiffs S.L. and
CAROLYN CAMPBELL

**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

S.L., a minor by and through the
Guardian Ad Litem Kristine Llamas
Leyva, individually and as successor-in-
interest to JOHNNY RAY LLAMAS,
deceased; V.L., by and through the
Guardian Ad Litem Amber Snetsinger,
individually and as successor-in-interest
to JOHNNY RAY LLAMAS, deceased;
and CAROLYN CAMPBELL,
individually,

Plaintiffs,

vs.

COUNTY OF RIVERSIDE; and DOES
1-10, inclusive,

Defendants.

Case No. 5:24-cv-00249-CAS-SP

*Hon. Christina A. Snyder,
Hon. Magistrate Sheri Pym,*

**DECLARATION OF SHANNON J.
LEAP IN SUPPORT OF
PLAINTIFFS' UNOPPOSED
MOTION TO AMEND.**

**Proposed Hearing Date: September 23,
2024 at 10:00 a.m.**

*[Proposed] Order; Plaintiffs' Unopposed
Motion and Notice of Unopposed Motion
to Amend filed concurrently herewith.]*

DECLARATION OF SHANNON J. LEAP

I, Shannon Leap, hereby declare as follows:

1. I am an attorney licensed to practice law in the United States District Court for the Central District of California. I am one of the attorneys of record for Plaintiff V.L. in this instant action. I make this declaration in support of Plaintiffs' motion to amend their complaint. I have personal knowledge of the matters stated herein and could and would testify competently thereto if called.

2. Attached hereto as **Exhibit 1** is a true and correct copy of Plaintiffs' [Proposed] First Amended Complaint, redlined per Local Rule 15-1 to identify the changes made to the operative complaint.

3. Attached here to as **Exhibit 2** is a clean copy of Plaintiffs' [Proposed] First Amended Complaint.

4. Prior to filing the instant Motion, Plaintiffs' counsel met and conferred with counsel for Defendant County of Riverside regarding Plaintiffs' intention to file a First Amended Complaint in this case after learning the identities of the involved deputies through the discovery process.

5. Plaintiffs learned of the identities of the involved deputies on June 11, 2024 in Defendant County's responses to Plaintiffs' interrogatories.

6. On July 16, 2024, I communicated with defense counsel, Kayleigh Andersen, inquiring whether Defendants would be willing to stipulate to an amendment adding the involved deputies as named defendants in place of "Doe" defendants in this case.

7. On that date, Kayleigh Andersen informed me that counsel for Defendants did not have authorization to stipulate to amend the complaint, but that defendant County of Riverside would not oppose a motion to amend, should Plaintiffs file one.

8. On August 20, 2024, I emailed a copy of Plaintiffs' Unopposed Motion to Amend, as well as the proposed amendments to Plaintiffs' First Amended Complaints as redlined and clean versions.

1 9. On August 20, 2024, Kayleigh Andersen confirmed that Defendants reviewed
2 and approve of the proposed amendments contained in the Proposed First Amended
3 Complaint filed concurrently herewith and would not be opposing Plaintiffs' filing
4 of the Proposed First Amended Complaint.

5
6 I declare under the penalty of perjury of the laws of the United States Constitution
7 that the foregoing is true and correct. Signed on this 20th Day of August, 2024, at
8 Woodland Hills, CA.

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11 By /s/ Shannon J. Leap
12 Shannon J. Leap
13 Attorney for Plaintiff
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